

From: [Steeger, Thomas](#)
To: [Laws, Meredith](#)
Subject: Re: Pollinator lable language discussion.
Date: Sunday, August 04, 2013 7:44:54 AM

There was some discussion of that for a while, but I don't know if it materialized.

From: Laws, Meredith
Sent: Saturday, August 03, 2013 8:27:24 PM
To: Moriarty, Thomas; Rate, Debra; Steeger, Thomas; Rossi, Lois
Subject: Re: Pollinator lable language discussion.

Did they go through a FIFRA 6f use deletion published in the FR?

From: Moriarty, Thomas
Sent: Friday, August 02, 2013 3:38:11 PM
To: Laws, Meredith; Rate, Debra; Steeger, Thomas; Rossi, Lois
Subject: RE: Pollinator lable language discussion.

I thought BCS and the other companies removed imidacloprid from almond, but retained the other sites in that crop grouping.

From: Laws, Meredith
Sent: Friday, August 02, 2013 3:35 PM
To: Rate, Debra; Steeger, Thomas; Moriarty, Thomas; Rossi, Lois
Subject: Re: Pollinator lable language discussion.

So, I'm wondering where Steve Dwinell got this info? These aren't import tolerances. Bayer took almonds off their imidacloprid products but I don't think other companies did. I'll write Steve back.
Thanks Debra.

From: Rate, Debra
Sent: Friday, August 02, 2013 2:57:30 PM
To: Laws, Meredith; Steeger, Thomas; Moriarty, Thomas; Rossi, Lois
Subject: RE: Pollinator lable language discussion.

Meredith-

Dinotefuran does not have tolerances for almonds (including hulls) or the Nut, tree, group 14. The other three have the established tolerances below:

Imidacloprid:	almond, hulls	4.0 ppm
	Nut, tree, group 14	0.05 ppm
Clothianidin:	almond, hulls	1.5 ppm
	Nut, tree, group 14	0.01 ppm

Thiamethoxam: almond, hulls 1.2 ppm
Nut, tree, group 14 0.02 ppm

Debra

Nut, tree, group 14**From:** Laws, Meredith
Sent: Friday, August 02, 2013 2:35 PM
To: Steeger, Thomas; Moriarty, Thomas; Rate, Debra; Rossi, Lois
Subject: Fw: Pollinator lable language discussion.

See below. We should double-check this. I think there is an almond tolerance for imidacloprid still on the books. Debra - can you check to see if there are almond (tree nut crop group) tolerances for any of the 4 neonics?

From: Dwinell, Steve <Steven.Dwinell@freshfromflorida.com>
Sent: Friday, August 02, 2013 1:12:39 PM
To: john.peckham@state.mn.us; Giguere, Cary; jgray@nd.gov; John.Scott@ag.state.co.us; Laws, Meredith; Bonnie Rabe; Brian Rowe; Clark, Charlie; Helfgott, Daniel; scottde@purdue.edu; Stangel, David; gfarnsworth@cdpr.ca.gov; Green, Jamie; Comstock, Jeff; Simpson, Julie; laura.quakenbush@ag.state.co.us; Richard Beard; Roelofs, James; Kendall, Ronald; Rose Kachadoorian; Shannon Joyner; Vicki Cassens
Cc: Comstock, Jeff
Subject: RE: Pollinator lable language discussion.

One informational note – We have been informed that there is no neonic use on almonds, so this language is not a factor for them.

Steven E. Dwinell
Assistant Director
Division of Agricultural Environmental Services
Florida Department of Agriculture and Consumer Services
850-617-7913
850-528-5314 cell
steven.dwinell@freshfromflorida.com
3125 Conner Boulevard
Tallahassee Florida 32399

www.FreshFromFlorida.com

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From: Peckham, John (MDA) [<mailto:john.peckham@state.mn.us>]
Sent: Friday, August 02, 2013 12:36 PM

To: Giguere, Cary; Gray, Jim A.; Scott, John (John.Scott@ag.state.co.us); Meredith Laws (Laws.Meredith@epamail.epa.gov); Bonnie Rabe; Brian Rowe; Clark, Charlie; Daniel Helfgott; Dave Scott; David Stangel; George Farnsworth; Jamie Green; Comstock, Jeff; Julie Simpson; Laura Quakenbush; Richard Beard; roelofs.jim@epa.gov; Ron Kendall; Rose Kachadoorian; Shannon Joyner; Dwinell, Steve; Vicki Cassens
Cc: Comstock, Jeff
Subject: RE: Pollinator lable language discussion.

Sorry I'm late on this.

For applicators, simple is always better. For states, enforceability is always a challenge. Trying to meld the two is often problematic.

1.FOR CROPS UNDER CONTRACTED POLLINATION SERVICES (MANAGED BEES)

I like the section that prohibits applications while bees are foraging. Additional language would be to not make applications from X hour to X hour/temp times etc.
The petal drop language is contrary to the reason why the bees are there in the first place.
The drift language is OK.
The bee movement/covering language is impractical.

2. FOR CROPS NOT UNDER CONTRACT FOR POLLINATION SERVICES (NON-MANAGED BEES)

The timing/temp language is good, but why is there a differentiation between pollination/non pollination?
The drift language is OK.
Language needs to be added for states which do not have apiary registries.

3. FOR ALL CROPS THAT ARE NOT POLLINATOR ATTRACTIVE

I like the off-site forage language

4. FOR ALL CONSUMER PRODUCTS AND ALL NON-AGRICULTURAL SITES (RESIDENTIAL/ORNAMENTAL/RECREATIONAL):

The blooming plant prohibition is problematic for many urban/landscape applications. If adopted, it would prevent a significant number of applications from occurring at the time when applications are typically made for apple scab/apple pests or delay applications. Combo treatments are often done.

All in all, I think a more simple approach would be to have one (1) Bee Box vs. the four (4).

Bee Protection Restrictions:

1. Only apply this product between the hours of X to X unless air temperatures are below X degrees.
2. Do not apply this product from sunup to sundown, unless air temperatures are below X degrees.
3. Do not apply this product to blooming plants.

4. Do not apply this product to or allow this product to drift to non-crop areas that contain blooming plants or where bees are located.

For soybean aphid in MN these restrictions would result in applications only being made at times when bee foraging would be expected to be low.

For the apple industry, the combo products may be restricted to applications early/late in the day.

For the ornamental industry, split applications of fungicides and insecticides would have to be done.

For almonds the proposed language is going to be problematic since bees are there to pollinate.